

EXHIBIT 31

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By Email

Kathy L. Osborn
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Dear Ms. Osborn:

Thank you for speaking with us on July 15, 2014 regarding our outstanding discovery requests to Thomson Consumer and Thomson SA. We write to memorialize our discussion. Please let us know if you disagree with anything.

Responsive Thomson SA documents. We confirmed that we are at an impasse regarding Thomson SA's production of responsive documents that reside in France. You confirmed that Thomson SA's position is that the documents cannot be produced in this case absent a request pursuant to the Hague Procedures, owing to the French blocking statute. You explained that you have not yet been able to compare the documents located in France – including the production that Thomson made to the European Commission – with the documents you have already produced to us, in order to determine how many are duplicative. You also speculated that the universe of responsive documents in France was very small.

Kathy L. Osborn

2

Responsive Thomson Consumer documents withheld on objections.

You indicated that there are only two categories of Thomson Consumer documents that are responsive to our document requests as drafted that you have withheld from production: (1) business expense documentation for some employees that had some responsibilities for CRTs but whose names have not arisen in the context of this litigation, where that business expense documentation does not reflect or relate to any communications or meetings with other manufacturers of CRTs; (2) approximately 50 general business documents that were produced to the Department of Justice comprising resumes and other administrative documents relating to employees that do not participate in activities relating to any of the allegations in this case and are not responsive to any outstanding request except for the request calling for the entirety of any submission that Thomson entities made to government regulators.¹ You indicated that you were unsure why they were produced to the DOJ in the first place and noted that they may not have been responsive to any governmental request.

Privileged Thomson Consumer documents. You explained that you are in the process of creating a privilege log of a very small number of documents. We stated that the DAPs' requests for production of documents asked for documents regarding document retention policies, and that we understood that such documents would either be produced or, if Thomson was claiming a privilege over them, should be reflected on a privilege log.

Forthcoming Thomson Consumer productions. You stated that we can expect an additional production of approximately 200 to 300 documents, likely within a week. This will include the documents you referred to in your letter dated July 14, 2014 which you had characterized as loan agreements between Thomson SA and its subsidiaries. You also stated that you will continue to produce documents on a rolling basis, but that you are close to the end.

Depositions. You told us that you have reached out to the individuals we identified in our July 7, 2014 letter as possible deponents (Jackie Taylor-Boggs, James Hanrahan, Alex Hepburn, and Jack Brunk), and that you will be able to make those individuals available for deposition prior to the close of fact discovery on September 5, 2014. You expressed that the depositions of JP Hanrahan and Alex Hepburn will require advance notice, because both individuals are caring for elderly parents. You agreed to accept service of subpoenas on behalf of any former employees about whom we have already inquired and with whom you have been in touch.

¹ You told us that although two or three of the documents may concern employees that we are otherwise interested in, the two or three documents are not otherwise responsive to any outstanding document request, except for the request calling for the entirety of any submission that Thomson entities made to government regulators.

Kathy L. Osborn

3

You stated that your understanding of Judge Conti's Discovery and Case Management Order (Dkt. No. 1128) provides that the DPP and IPP classes may collectively take up to 15 hours, 7.5 of which belongs to each class, and that the Individual Action Plaintiffs get an additional 3 hours, which brings the total to 10.5 hours. We explained that we have a different understanding. We agreed that, for current purposes, the discussion may be academic unless it appears that we will require 18 hours of time. We reserve our rights on the issue.

Data files. You emailed us after our telephone call to inform us that you are reproducing the load files for your prior productions so that we will have access to the metadata as required by the Stipulation and Order Regarding the Production of Electronically Stored Information (Dkt. No. 828). We look forward to receive this information by the end of this week.

Very truly yours,

/s/ Craig A. Benson

Craig A. Benson